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December 11, 2019

VIA ECF

Honorable Judge Analisa Torres
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Bowen v. Knolls Company, et al.
SDNY Case No.: 19-cv-08759

Dear Judge Torres,

This office represents the Plaintiff, Daniel Bowen, in the above-captioned case. An initial pre-trial conference is scheduled for December 18, 2019 at 3:20 p.m., rescheduled from November 20, 2019 and December 8, 2019.

At this time, Plaintiff has been unsuccessful in obtaining service of process on Defendant, Knolls Company. However, efforts are still underway. This Defendant does not list a registered agent with the New York Secretary of State. Counsel for Defendant, Fresh King Market Inc., has recently reached out and will be filing a notice of appearance and requesting an extension of time to file a responsive pleading. As such, Plaintiff respectfully requests that this Court adjourn the conference to an alternate date and time to allow Defendants to make appearances. This is the third request for an adjournment of this conference, and the request will not prejudice any parties or affect any other scheduled dates.

We thank the Court for your time and consideration in this matter.

GRANTED. The initial pretrial conference scheduled for December 18, 2019 is ADJOURNED to **January 16, 2020, at 10:40 a.m.** By **January 9, 2020**, the parties shall file their joint status letter and proposed case management plan.

If Knolls Company still has not been served by the date of the pre-conference submissions deadline, Plaintiff shall file a letter updating the Court on the efforts made to effectuate service.


SO ORDERED.

Dated: December 13, 2019
New York, New York

Respectfully Submitted,

Law Offices of Nolan Klein, P.A.

By: /s/ Hector V. Ramirez
HECTOR V. RAMIREZ, ESQ.
(HR3270)



ANALISA TORRES
United States District Judge